

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

UNITED STATES OF AMERICA

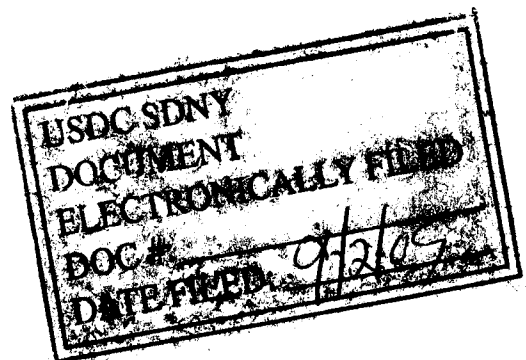
-v.-

FRANCISCO GONZALEZ-URIBE,  
a/k/a "Patron,"  
a/k/a "Gerardo Hernandez,"  
JOSE BEDOYA-MEJIA,  
a/k/a "Jota"  
JOHN FREDY NORENA-CORREA,  
a/k/a "Frank,"  
JOSE MOSQUERA-PRADO,  
a/k/a "El Negro,"  
HECTOR FABIO OSPINO-ROSERO,  
a/k/a "Juancho,"  
ALFREDO NUNEZ-FERMIN, and  
ADOLMAN DILONE-ALMONTE,  
a/k/a "Tamangari,"

Defendants.

SEALED SUPERSEDING  
INDICTMENT

S1 09 Cr. 723 (LAK)



COUNT ONE

The Grand Jury charges:

1. From at least in or about 2007, up to and including the present, in the Southern District of New York and elsewhere, FRANCISCO GONZALEZ-URIBE, a/k/a "Patron," a/k/a "Gerardo Hernandez," JOSE BEDOYA-MEJIA, a/k/a "Jota," JOHN FREDY NORENA-CORREA, a/k/a "Frank," JOSE MOSQUERA-PRADO, a/k/a "El Negro," HECTOR FABIO OSPINO-ROSERO, a/k/a "Juancho," ALFREDO NUNEZ-FERMIN, and ADOLMAN DILONE-ALMONTE, a/k/a "Tamangari" the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate

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and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FRANCISCO GONZALEZ-URIBE, a/k/a "Patron," a/k/a "Gerardo Hernandez," JOSE BEDOYA-MEJIA, a/k/a "Jota," JOHN FREDY NORENA-CORREA, a/k/a "Frank," JOSE MOSQUERA-PRADO, a/k/a "El Negro," HECTOR FABIO OSPINO-ROSERO, a/k/a "Juancho," ALFREDO NUNEZ-FERMIN, and ADOLMAN DILONE-ALMONTE, a/k/a "Tamangari," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances involved in the offense were: (i) 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, and (ii) 1 kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A).

#### Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about the January 7, 2009, in Colombia, FRANCISCO GONZALEZ-URIBE, a/k/a "Patron," a/k/a "Gerardo Hernandez," the defendant, participated in a telephone call in

which GONZALEZ-URIBE agreed to participate in the delivery of 16 kilograms of heroin to New York, New York.

b. On or about January 9, 2009, in Colombia, JOSE BEDOYA-MEJIA, a/k/a "Jota," and JOHN FREDY NORENA-CORREA, a/k/a "Frank," the defendants, participated in a telephone call in which BEDOYA-MEJIA and NORENA-CORREA discussed the markings that would appear on a shipment of heroin that was scheduled to be delivered to New York, New York.

c. On or about January 27, 2009, in Colombia, JOSE MOSQUERA-PRADO, a/k/a "El Negro," the defendant, participated in a telephone call in which MOSQUERA-PRADO described his intentions to ship between 100 and 200 kilograms of cocaine to New York, New York.

d. On or about January 26, 2009, in Colombia, HECTOR FABIO OSPINO-ROSERO, a/k/a "Juancho," the defendant, participated in a telephone call in which he stated that he had arranged for persons at his direction to manage the receipt of 16 kilograms of heroin being shipped to New York, New York.

e. On or about January 12, 2009, in the Dominican Republic, ALFREDO NUNEZ-FERMIN, and ADOLMAN DILONE-ALMONTE, a/k/a "Tamangari," the defendants, together with other co-conspirators not named herein, possessed approximately 16 kilograms of heroin.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

5. From at least in or about 2007, up to and including the present, in the Southern District of New York and elsewhere, FRANCISCO GONZALEZ-URIBE, a/k/a "Patron," a/k/a "Gerardo Hernandez," JOSE BEDOYA-MEJIA, a/k/a "Jota," JOHN FREDY NORENA-CORREA, a/k/a "Frank," JOSE MOSQUERA-PRADO, a/k/a "El Negro," HECTOR FABIO OSPINO-ROSERO, a/k/a "Juancho," ALFREDO NUNEZ-FERMIN, and ADOLMAN DILONE-ALMONTE, a/k/a "Tamangari," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that FRANCISCO GONZALEZ-URIBE, a/k/a "Patron," a/k/a "Gerardo Hernandez," JOSE BEDOYA-MEJIA, a/k/a "Jota," JOHN FREDY NORENA-CORREA, a/k/a "Frank," JOSE MOSQUERA-PRADO, a/k/a "El Negro," HECTOR FABIO OSPINO-ROSERO, a/k/a "Juancho," ALFREDO NUNEZ-FERMIN, and ADOLMAN DILONE-ALMONTE, a/k/a "Tamangari," the defendants, and others known and unknown, would and did import into the United States from a place outside thereof, controlled substances, in violation of 21 U.S.C. § 960(a)(1).

7. The controlled substances involved in the offense were: (i) 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, and (ii) 1 kilogram

and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 960(b)(1)(A).

Overt Acts

8. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about the January 7, 2009, in Colombia, FRANCISCO GONZALEZ-URIBE, a/k/a "Patron," a/k/a "Gerardo Hernandez," the defendant, participated in a telephone call in which GONZALEZ-URIBE agreed to participate in the delivery of 16 kilograms of heroin to New York, New York.

b. On or about January 9, 2009, in Colombia, JOSE BEDOYA-MEJIA, a/k/a "Jota," and JOHN FREDY NORENA-CORREA, a/k/a "Frank," the defendants, participated in a telephone call in which BEDOYA-MEJIA and NORENA-CORREA discussed the markings that would appear on a shipment of heroin that was scheduled to be delivered to New York, New York.

c. On or about January 27, 2009, in Colombia, JOSE MOSQUERA-PRADO, a/k/a "El Negro," the defendant, participated in a telephone call in which MOSQUERA-PRADO described his intentions to ship between 100 and 200 kilograms of cocaine to New York, New York.

d. On or about January 26, 2009, in Colombia, HECTOR FABIO OSPINO-ROSETO, a/k/a "Juancho," the defendant, participated

in a telephone call in which he stated that he had arranged for persons at his direction to manage the receipt of 16 kilograms of heroin being shipped to New York, New York.

e. On or about January 12, 2009, in the Dominican Republic, ALFREDO NUNEZ-FERMIN, and ADOLMAN DILONE-ALMONTE, a/k/a "Tamangari," the defendants, together with other co-conspirators not named herein, possessed approximately 16 kilograms of heroin.

(Title 21, United States Code, Section 963.)

#### FORFEITURE ALLEGATION

9. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, FRANCISCO GONZALEZ-URIBE, a/k/a "Patron," a/k/a "Gerardo Hernandez," JOSE BEDOYA-MEJIA, a/k/a "Jota," JOHN FREDY NORENA-CORREA, a/k/a "Frank," JOSE MOSQUERA-PRADO, a/k/a "El Negro," HECTOR FABIO OSPINO-ROSERO, a/k/a "Juancho," ALFREDO NUNEZ-FERMIN, and ADOLMAN DILONE-ALMONTE, a/k/a "Tamangari," the defendants, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Counts One and Two of this Indictment.

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(1) cannot be located upon the exercise of due diligence;

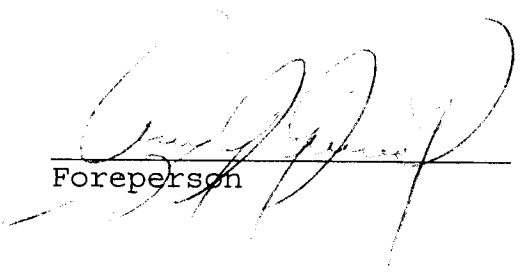
(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

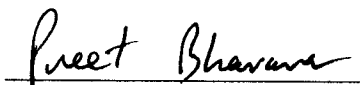
(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 960(a), and 853.)



Foreperson



PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v -

FRANCISCO GONZALEZ-URIBE, a/k/a "Patron," a/k/a "Gerardo Hernandez," JOSE BEDOYA-MEJIA, a/k/a "Jota," JOHN FREDY NORENA-CORREA, a/k/a "Frank," JOSE MOSQUERA-PRADO, a/k/a "El Negro," HECTOR FABIO OSPINO-ROSETO, a/k/a "Juancho," ALFREDO NUNEZ-FERMIN, and ADOLMAN DILONE-ALMONTE, a/k/a "Tamangari,"

Defendants.

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SUPERSEDING INDICTMENT

S1 09 Cr. 723 (LAK)

(21 U.S.C. §§ 846, 963,  
and 853.)

PREET BHARARA  
United States Attorney.

A TRUE BILL

  
Foreperson.

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